

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

QUINCY LOUIS FRICK

INDICTMENT

Case No. _____

Violations: 18 U.S.C. §§ 2251(a),
2251(e), 2252(a)(2), 2252(b)(1), 2253(a),
2261A(2)(B), and 2261(b)

COUNT ONE

Sexual Exploitation of a Child

The Grand Jury Charges:

From in or about November 2019 to in or about February 2020, in the District of
North Dakota, and elsewhere,

QUINCY LOUIS FRICK

did knowingly use, persuade, induce, entice, and coerce K.B., a person whom he knew to
be 13 to 14 years of age, to engage in sexually explicit conduct for the purpose of
producing visual depictions of such conduct, knowing, and having reason to believe, that
such visual depictions were produced using materials that have been mailed, shipped, and
transported in or affecting interstate and foreign commerce by any means, including by
computer;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT TWO

Receipt of Images Depicting the Sexual Exploitation of Children

The Grand Jury Further Charges:

From in or about November 2019 to in or about February 2020, in the District of North Dakota, and elsewhere,

QUINCY LOUIS FRICK

knowingly received visual depictions using a means and facility of interstate and foreign commerce, to wit, the internet, which depictions had been transported in interstate and foreign commerce by any means, including by computer, the production of which visual depictions involved the use of a 13-to14-year-old minor engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT THREE

Distribution of Images Depicting the Sexual Exploitation of Children

The Grand Jury Further Charges:

From in or about November 2019 to in or about February 2020, in the District of North Dakota,

QUINCY LOUIS FRICK

knowingly distributed visual depictions using a means and facility of interstate and foreign commerce, specifically, the internet, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT FOUR

Transfer of Obscene Materials to Minors

The Grand Jury Further Charges:

From in or about November 2019 to in or about February 2020, in the District of North Dakota,

QUINCY LOUIS FRICK

did knowingly transfer obscene material to individuals who had not attained the age of 16 years, knowing that such other individuals had not attained the age of 16 years, using any facility and means of interstate and foreign commerce;

In violation of Title 18, United States Code, Section 1470

COUNT FIVE

Cyberstalking

The Grand Jury Further Charges:

From in or about November 2019 to in or about February 2020, in the District of North Dakota, and elsewhere,

QUINCY LOUIS FRICK,

with the intent to harass and intimidate, used an interactive computer service, and an electronic communications service and electronic communication system of interstate commerce, and any other facility of interstate and foreign commerce, specifically, the internet, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to K.B.;

In violation of Title 18, United States Code, Section 2261A(2)(B) and 2261(b).

FORFEITURE ALLEGATION

The Grand Jury Further Finds Probable Cause That:

Upon conviction of violating Title 18, United States Code, Section 2252, as charged in this Indictment,

QUINCY LOUIS FRICK

shall forfeit to the United States any and all matter which contains visual depictions produced, transported, shipped, and received in violation thereof and any and all property used and intended to be used in any manner and part to commit and to promote the commission of such violations, including, but not limited to, the following:

- One LG Model LML212VL Smartphone, MEID: 089269198500099112.

By virtue of commission of one or more of the felony offenses as charged in this Indictment, all right, title, and interest in the above-described property is vested in the United States and is hereby forfeited to the United States, pursuant to Title 18, United States Code, Section 2253(a).

A TRUE BILL:

/s/ Foreperson
Foreperson

/s/ Drew H. Wrigley
DREW H. WRIGLEY
United States Attorney

GLD/tmg